



Air Quality Permitting Statement of Basis

February 13, 2007

Tier I Operating Permit No. T1-060445

Sinclair Burley Products Terminal,
Sinclair Transportation Co.
Burley

Facility ID No. 031-00026

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DRAFT FOR PUBLIC COMMENT

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Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAPs	Hazardous Air Pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
MACT	Maximum Achievable Control Technology
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
Rules	Rules for the Control of Air Pollution in Idaho
SIC	Standard Industrial Classification
Sinclair	Sinclair Burley Products Terminal, Sinclair Transportation Company
SIP	State Implementation Plan
SO ₂	sulfur dioxide
SVE	Soil Vapor Extraction
Tier I	Tier I operating permit
T/yr	tons per any consecutive 12-month period
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. PURPOSE

The purpose of this memorandum is to explain the legal and factual basis for this Tier I operating permit (Tier I) renewal in accordance with IDAPA 58.01.01.362.

The Department of Environmental Quality (DEQ) has reviewed the information provided by Sinclair Burley Products Terminal, Sinclair Transportation Company (Sinclair) regarding the operation of its facility located in Burley. This information was submitted based on the requirements to submit a Tier I operating permit application in accordance with IDAPA 58.01.01.300.

2. FACILITY DESCRIPTION

Sinclair operates a petroleum products storage and distribution facility located in Burley, Idaho.

3. FACILITY/AREA CLASSIFICATION

This facility is a major facility as defined by IDAPA 58.01.01.008.10, because it emits or has the potential to emit a regulated air pollutant(s) in amounts greater than or equal to major facility threshold(s) listed in Subsection 008.10.

This facility is not a designated facility as defined by IDAPA 58.01.01.006.26.

This facility is a major facility as defined by IDAPA 58.01.01.205, because it emits or has the potential to emit a regulated criteria air pollutant (VOC) in amounts greater than or equal to 250 tons per year.

The Standard Industrial Classification (SIC) defining the facility is 5171, and the Aerometric Information Retrieval System (AIRS) facility classification is A. The AIRS can be found in Appendix.

The facility is located in Burley, which is designated as unclassifiable for all regulated criteria pollutants (PM₁₀, CO, NO_x, SO₂, lead, and ozone). There is not a Class I area(s) within 10 kilometers of the facility. This facility is located in Air Quality Control Region (AQCR) 63 and Universal Transverse Mercator (UTM) Zone 12.

4. APPLICATION SCOPE

This application is for a Tier I renewal. There are no substantial changes since the Tier I issued January 13, 2004, except for the addition of the soil vapor extraction system which was exempted. The exemption concurrence was issued by DEQ on February 13, 2004 (revised on October 14, 2004).

5. SUMMARY OF EVENTS

October 12, 2006	DEQ received the Tier I application.
November 10, 2006	DEQ declared the application complete.
January 9, 2007	Facility draft permit was sent to the facility for review.

6. PERMIT CONDITIONS REVIEW

- 6.1 Permit Condition 2.14.1 was revised to add an alternative sulfur content testing method as requested by the applicant.

Per the information provided by the applicant during facility draft review, Sinclair is in the process of certifying a new test method for testing low sulfur fuel (i.e., standard test method for sulfur in gasoline and diesel fuel by monochromatic wavelength dispersive x-ray fluorescence spectrometry, ASTM D-7039-04). This is the new method that EPA requires to show compliance with the new Ultra Low Sulfur Diesel regulation. Upon approval, Sinclair would like to use this method to also comply with Permit Condition 2.14.

Per information provided by the applicant on February 6, 2007, the aforementioned X-ray test method will work for both the current "on-road" diesel (i.e., low sulfur diesel < 500 ppm sulfur or < 0.05% sulfur) and the new ultra low sulfur diesel (< 15 ppm sulfur). The certification of this instrument included data in the range of 15 to 500 ppm (by weight).

Sinclair, Burley terminal currently only distributes "on-road" diesel. The 0.50% sulfur is for diesel that can have more sulfur than the "on-road" varieties. Should Sinclair decide to distribute "off-road" diesel with sulfur content greater than 500 ppm (outside the range of the X-ray test method), Sinclair will use one of the other methods allowed by the permit.

- 6.2 The Soil Vapor Extraction (SVE) system was installed to remove hydrocarbons from contaminated soil at various locations by the facility. The SVE system was installed under a Permit to Construct Exemption granted by the Division on February 18, 2004 (revised on October 14, 2004). The SVE system didn't qualify as an insignificant activity as listed under IDAPA 58.01.01.317. Therefore, it was included in Section 8 of the permit.
- 6.3 For clarification purpose, footnotes were added to Tables 3.1 to 7.1, and minor changes were made to Permit Conditions 3.4, 4.4, 5.4, and 6.4.
- 6.4 Minor corrections were made to Permit Conditions 3.1, 3.2, 4.1, 4.2, 5.1, 5.2, 6.1, 6.2, 7.1, and 7.2.
- 6.5 The General Provisions were updated. The General Provisions in the current Tier I template were used for this Tier I renewal.
- 6.6 The numbering of the facility-wide permit conditions was changed due to the use of the most current Tier I template.

7. PERMIT REVIEW

7.1 Regional Review of Draft Permit

DEQ provided the draft permit to its Twin Falls Regional Office on December 22, 2006. Twin Falls Regional Office did not have any comments regarding the draft permit.

7.2 Facility Review of Draft Permit

DEQ provided the draft permit to Sinclair located at Burley for its review on January 9, 2007. The comments on the facility draft were received on February 1, 2007. The comments were addressed in the permit.

7.3 *Public Comment*

DEQ will provide the draft permit for public comment in accordance with IDAPA 58.01.0.364.

8. REGISTRATION FEES

This facility is a major facility as defined by IDAPA 58.01.01.008.10; therefore, registration and registration fees in accordance with IDAPA 58.01.01.387 apply. The facility is in compliance with registration and registration fee requirements.

9. RECOMMENDATION

Based on the Tier I application and review of state rules and federal regulation, staff recommends that DEQ issue draft Tier I No. T1-060445 for public comment for Sinclair Burley Products Terminal, Sinclair Transportation Co. This permit renews the facility's existing Tier I. The project does not involve PSD permitting requirements.

SYC/bf Permit No. T1-060445

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Appendix

Sinclair Burley Products Terminal,
Sinclair Transportation Co.

Burley

Tier I Operating Permit No. T1-060445

Facility ID No. 031-00026

AIRS Data Entry Form

AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

Facility Name: Sinclair Burley Products Terminal, Sinclair Transportation Co.
Facility Location: Burley
AIRS Number: 031-00026

AIR PROGRAM POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	AREA CLASSIFICATION A-Attainment U-Unclassified N- Nonattainment
SO ₂	B						B	U
NO _x	B						B	U
CO	B						B	U
PM ₁₀	B						B	U
PT (Particulate)	B						B	
VOC	A						A	U
THAP (Total HAPs)	SM						SM	
APPLICABLE SUBPART								

^a Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b AIRS/AFS Classification Codes:

A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAPs only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, or each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAPs.

SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.

B = Actual and potential emissions below all applicable major source thresholds.

C = Class is unknown.

ND = Major source thresholds are not defined (e.g., radionuclides).